

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,	:	Case No. 1:15CR116(12)
	:	
Plaintiff,	:	(Judge Black)
	:	
vs.	:	
	:	
ASHLEY WILSON,	:	<b><u>DEFENDANT, ASHLEY WILSON'S,</u></b>
	:	<b><u>AMENDED MOTION TO MODIFY</u></b>
	:	<b><u>BOND CONDITIONS</u></b>
Defendant.	:	

---

Now comes Defendant, Ashley Wilson, through counsel, and she states as follows:

1. She withdraws her previous request to modify the no-contact order that exists forbidding any contact between her and co-defendant, Stacey Howell.
2. However, Defendant, Ashley Wilson, respectfully moves the Court to modify the no-contact order forbidding contact between herself and co-defendant, Kyle Steger, who is the father of her 2-year old child in her custody. Ms. Wilson would like to be able to communicate by phone or in person with co-defendant, Kyle Steger, as to matters regarding their 2-year old child. There have been no problems or issues with Pre-Trial Supervision since Ms. Wilson's release from custody on November 10, 2015. Pre-Trial Officer, Katrina Tibbs, advised counsel

that she has no objection to this modification of bond allowing contact with Kyle Steger.

Moreover, Assistant United States Attorney, Kenneth L. Parker, advised counsel that he does not oppose the bond modification as to Kyle Steger only.

It is, therefore, respectfully requested that the no-contact order be lifted only as to Kyle Steger.

/s/ Richard J. Goldberg  
Richard J. Goldberg (0005979)  
Attorney for Ashley Wilson  
Schuh & Goldberg, LLP  
2662 Madison Road  
Cincinnati, Ohio 45208  
(513) 321-2662  
(513) 321-0855 (Fax)  
richjgoldberg@yahoo.com

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing Amended Motion upon the office of the United States Attorney for the Southern District of Ohio, via electronic filing, this 1<sup>st</sup> day of March, 2016.

/s/ Richard J. Goldberg  
Richard J. Goldberg  
Attorney for Ashley Wilson